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 Attorneys for Defendant
 JETBLUE AIRWAYS CORPORATION

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

SHAWN GRANBERRY,

 Plaintiff,

 vs.

 JETBLUE AIRWAYS,

 Defendant.

CASE NO. C 04 0845 JSW

**STIPULATION AND ~~PROPOSED~~
 ORDER TO EXTEND DEFENDANT'S
 TIME TO RESPOND TO PLAINTIFF'S
 SUPPLEMENTAL REQUEST FOR
 PRODUCTION OF DOCUMENTS
 BEYOND THE DISCOVERY CUTOFF
 DATE**

The Hon. Jeffrey S. White, Dept. 2
 Action Filed: March 1, 2004

Discovery Cutoff: June 30, 2005
 Motion Cutoff: September 9, 2005
 Trial Date: November 28, 2005

WHEREAS, the fact discovery cutoff date is currently set on June 30, 2005;
 WHEREAS, Defendant recently discovered the existence of backup tapes
 containing documents which may be responsive to discovery propounded by
 Plaintiff;

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1 WHEREAS, Defendant is only aware of the existence of the backup tapes,
2 but has not had an opportunity to locate or review the tapes for responsive
3 documents;

4 WHEREAS, Defendant requests a 30-day extension beyond the current
5 discovery cutoff date in order to locate and ascertain whether the tapes contain any
6 responsive documents; and
7

8 IT IS HEREBY STIPULATED by and between the parties to this action,
9 through their respective counsel, AND IT IS HEREBY REQUESTED OF THE
10 COURT that discovery shall remain open for a period of 30 days to July 30, 2005
11 for the limited purpose of Defendant providing supplemental responses to discovery
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1 and, if necessary, the reconvening of depositions solely for questioning concerning
2 the supplemental responses to discovery, i.e., responses provided after June 30,
3 2005.

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5 DATED: June 29, 2005

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7 By: M. 2
8 ~~DAVID A. WIMMER~~ MELISSA
9 Attorneys for Defendant JETBLUE TURK
AIRWAYS CORPORATION

10 DATED: June 29, 2005

COLE & FASANO

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12 By: R. L. Cole
13 RUFUS L. COLE
14 Attorneys for Plaintiff SHAWN
15 GRANBERRY

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18 IT IS SO ORDERED:

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20 Dated: June 30, 2005

/s/Jeffrey S. White

21
22 The Honorable Jeffrey S. White
23 UNITED STATES DISTRICT COURT
24 JUDGE

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28 E5992.1

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C 04 0845 JSW
STIPULATION TO EXTEND TIME TO
RESPOND TO P'S REQUEST FOR
PRODUCTION OF DOCS

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